

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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KENNETH LEAR,

Plaintiff,

v.

ROYAL CARIBBEAN CRUISES LTD.,  
d/b/a ROYAL CARIBBEAN  
INTERNATIONAL, GREGORY BROWN,  
individually, ROBERT KING, individually,  
and GRISEL GARCIA RODRIGUEZ,  
individually

Defendants.

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: Case No. 1:20-cv-04660-GHW  
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: *Civil Action*  
:  
: **DEFENDANTS' RULE 12(b)(2) NOTICE**  
: **OF MOTION TO DISMISS THE**  
: **AMENDED COMPLAINT OR, IN THE**  
: **ALTERNATIVE, TRANSFER THE**  
: **ACTION**  
: **Document Filed Electronically**  
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**PLEASE TAKE NOTICE** that, upon the Declarations of Gregory Brown, Robert Kling, Grisel Garcia Rodriguez and Yamilet Hurtado dated October 23, 2020, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings in this action, the undersigned will move this Court before the Honorable Gregory H. Woods, United States District Judge, in the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 12C, New York, New York 10007, on a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure dismissing Plaintiff's claims with prejudice or, in the alternative, transferring this action to the U.S. District Court for the Southern District of Florida.

**PLEASE TAKE FURTHER NOTICE** that Defendant requests oral argument.

Dated: Morristown, New Jersey  
November 23, 2020

Respectfully Submitted,

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**  
*Attorneys for Defendants*

By: /s/ Steven J. Luckner

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